

EXHIBIT 11

**Redacted Version of
Document Sought to
be Sealed**

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BERNTSON FACT SHEET

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User case: *from June 1, 2016 to the present, logged-out, private browsing on any browser on mobile or desktop, visiting websites that use Google Analytics and Ad Manager.*

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Documents

TAB	Bates	Description
60	GOOG-BRWN-00078435	Composite spreadsheet listing relevant ads and analytics b-logs
23	GOOG-BRWN-00029326	Fingerprinting Policy
22	GOOG-BRWN-00029004	Log Data Usage Rules
20	GOOG-BRWN-00028990	User Data Retention and Deletion Guidelines
9	GOOG-BRWN-00008988	Analytics UserID Help Files
57	GOOG-BRWN-00078394	Unauthenticated Data Production
58	GOOG-BRWN-00078395	NID & IDE Decryptions

Preparation

+3 meetings with counsel; total preparation time +25 hours; at least 61 docs reviewed

- Interviews
 - Sree Pothana
 - Chris Liao
 - Michael Ortega-Binderberger
 - Curt Harting
 - Benjamin Kornacki
 - Alexei Svitkine
 - Mark Pearson
 - David Turner

Topics

1	Identification of logs, database, storage systems, and data structures containing private browsing information and data derived from private browsing, including “raw logs” containing referrer and other HTTP header information. TAB 59; TAB 60; TAB 61
2	Google’s ability (regardless of Google’s policies) to search for and collect private browsing information from the logs, databases, storage systems, and data structures identified in Topic 1, including through the use of Google internal databases and tools both by individuals at Google and by automated mechanisms. TAB 17; TAB 18; TAB 22; TAB 23
3	The origins of the logs, databases, storage systems, and data structures identified in Topic 1, including how the tools, applications, systems, devices, and products and services that generate

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	the logs, databases, storage systems, and data structures have functioned during the class period. TAB 17; TAB 18; TAB 22; TAB 23
4	Google's retention policies and practices for the logs, databases, storage systems, and data structures identified in Topic 1, including any changes during the class period. TAB 20; TAB 60
5	Google's preservation for purposes of this litigation of the logs, databases, storage systems, and data structures identified in Topic 1, including any changes during the class period.
6	As referenced and shown in logs, databases, storage systems, and data structures, Google's identification and correlation of users, devices, electronic addresses, and any other identifiers in connection with web browsing activities, including by the use of identifiers decipherable only to Google (e.g., Google's X-Client-Data header, GAIA, Zwieback, Biscotti, [REDACTED], and [REDACTED] cookies (and similar [REDACTED])) and Google processes running on the device and any third party identifiers hosted by Google. TAB 9; TAB 15; TAB 54; TAB 59; TAB 61
7	How identifiers decipherable only to Google of Topic 6, (e.g., Google's X-Client-Data header, GAIA, and Zwieback, Biscotti, [REDACTED], and [REDACTED] cookies (and similar [REDACTED])), are created, determined, and derived. TAB 28; TAB 35; TAB 43; TAB 45; TAB 50; TAB 53
8	As referenced and shown in logs, databases, storage systems, and data structures, how and when concurrent Google processes on a device, outside of the user's browser, may interact or capture private browsing data, whether directly or indirectly. TAB 54; TAB 55
9	As referenced and shown in logs, databases, storage systems, and data structures, how and when Google processes attempt to link, correlate, associate, or otherwise join either probabilistically or deterministically data collected from concurrent processes on a device, including in connection with private browsing data. TAB 54; TAB 55
10	How and when concurrent Google processes on a device, outside of the user's browser, may generate logs, database, storage system, and data structure entries that include private browsing data or data derived from private browsing information. TAB 54; TAB 55
11	How data generated by Google's provision of its products and services is logged, stored, and structured by Google, including private browsing data. TAB 37; TAB 57; TAB 60
12	Identification of Google employees with responsibilities tied to Topics 1-11.

ST = semantic; DF = Data Format

[illegible]

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Cookies & IDs

Cookie Name	Purpose(s)	Product(s)	Cookie Lifespan	Domain(s)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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Display Tool

Response to Topic 12

1	Michael Ortega-Binderberger, Curt Harting
2	Jochen Eisinger
3	Matt Harren
4	Curt Harting, Matt Harren
5	n.a.
6	Chris Liao

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7	Chris Liao, Alexei Svitkine
8	n.a.
9	Glenn Berntson
10	n.a.
11	Michael Ortega-Binderberger, Curt Harting, Dan Stone